

# EXHIBIT K



Arjun Vasan <arjun.vasan@gmail.com>

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## Violation of Judge Frimpong's Standing Order - Lead Counsel presence required at Rule 26 Conference

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Keech, Ryan Q. <Ryan.Keech@klgates.com>

Thu, Aug 7, 2025 at 5:13 PM

To: Arjun Vasan <arjun.vasan@gmail.com>, "Makitalo, Rebecca I." <Rebecca.Makitalo@klgates.com>, "Chiu, Stacey G."

<Stacey.Chiu@klgates.com>

Cc: "Winningham, Jacob R." <Jacob.Winningham@klgates.com>

Mr. Vasan,

We write in response to your message below – one of a series of dozens of variously understandable missives you have sent over the past few weeks from the hospital and/or your parents' home – and to confirm that your description is inaccurate. Personally, I am astonished at what Ms. Makitalo described to me: apparently incredulous with the notion that Ms. Makitalo, as a capable woman lawyer, could possibly be empowered to be lead on your case in lieu of Mr. Huey or myself, as she is, you kept demanding, again and again, that she provide you with another, presumably male, name.

I can once again confirm that Ms. Makitalo was and is fully empowered as the lead on this case. And as for your grossly unprofessional behavior this afternoon, there will not be a next time, because Ms. Makitalo has confirmed that if you do that again, any conversation with you will end immediately. If you cannot ultimately control yourself, we will block your emails from our servers, direct that our client do the same and will require that any future required discussions in this case take place in person and in the presence of a court reporter.

As Ms. Makitalo indicated, discovery is now open. I believe she will be in touch with Mr. Vasan (Sr.) regarding his obligations shortly.

Best regards,

Ryan



Ryan Q. Keech  
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Arjun Vasan <arjun.vasan@gmail.com>

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## Violation of Judge Frimpong's Standing Order - Lead Counsel presence required at Rule 26 Conference

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Keech, Ryan Q. <Ryan.Keech@klgates.com>

Thu, Aug 7, 2025 at 5:53 PM

To: Arjun Vasan <arjun.vasan@gmail.com>

Cc: "Makitalo, Rebecca I." <Rebecca.Makitalo@klgates.com>, "Chiu, Stacey G." <Stacey.Chiu@klgates.com>, "Winningham, Jacob R." <Jacob.Winningham@klgates.com>

While we're not sure how to address the baffling notion of having your mother and father listen in on a call in this case without disclosing same, that's four more variously harassing and insulting emails within the space of twenty minutes. We thus remind you again that if you cannot bring yourself to act professionally and control yourself, you will be blocked from further contact.

As for discovery from Mr. Vasan, our team looks forward to deposing your father about the claims he made in that declaration regarding ownership of the intellectual property at issue, your claim that he listened to this phone call, and obtaining his relevant documents.

[Quoted text hidden]



Arjun Vasan <arjun.vasan@gmail.com>

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## Notice of Breach Regarding Service Method – Merger Agreement § 9.11

Keech, Ryan Q. <Ryan.Keech@klgates.com>  
To: Arjun Vasan <arjun.vasan@gmail.com>  
Cc: "Warns, Tom A." <Tom.Warns@klgates.com>

Fri, May 30, 2025 at 5:29 PM

Mr. Vasan,

So that we may evaluate your position, please explain, in detail and with evidence, what it is about our client's claims against you – and the evidence of your conduct – that you consider to be "ridiculous" or that will "embarrass" it.

Otherwise, while you are a pro se litigant and it is clear that you are angry, nothing excuses you from compliance with the basic obligations imposed on every litigant. As has been explained to you, there is no justification for your admitted, consistent and ongoing use of "generative AI" to prepare documents that violate these obligations and further your stated goal to "crush," "ruin" and "embarrass" Checkmate and its counsel. On behalf of our client, we ask that you please identify any "generative AI" platform you have utilized and are utilizing in drafting and revising any documents filed or served in this case and make sure that you preserve any associated records.

Best regards,

**K&L GATES**

Ryan Q. Keech  
Partner  
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**From:** Arjun Vasan <arjun.vasan@gmail.com>  
**Sent:** Friday, May 30, 2025 4:18 PM



Arjun Vasan <arjun.vasan@gmail.com>

## Notice of Breach Regarding Service Method – Merger Agreement § 9.11

Keech, Ryan Q. <Ryan.Keech@klgates.com>  
To: Arjun Vasan <arjun.vasan@gmail.com>  
Cc: "Warns, Tom A." <Tom.Warns@klgates.com>

Fri, May 30, 2025 at 7:14 PM

Mr. Vasan,

We understand from your continued failure to provide any evidence of what it is about our client's claims against you that you consider to be "ridiculous" or that will "embarrass" it that you have no such evidence and that you, further, believe you have no obligation to provide such evidence. We further understand that your only excuses for the conduct you are alleged to have engaged in are that our client has, in your view, suffered no damage and that you believe that your admitted solicitation of Checkmate competitors does not constitute a breach of any obligations. We, finally, understand that you intend to shift blame to other VoiceBite "co-founders" for the fraud that you are alleged to have orchestrated. They will likely need to be made aware of your serious allegations: please let us know if you have any objections to us doing so.

"Advances in technology" that have "leveled the playing field" is certainly an interesting euphemism for your admitted, consistent and ongoing use of "generative AI" to prepare and file documents that violate the rules and further your stated goal to "crush," "ruin" and "embarrass" Checkmate and its counsel. It is clear that whatever platform that you are utilizing is telling you what you want to hear, which of course is its function. But it is not telling you, because it is not designed to tell you, the truth. More seriously, it is enabling repeated and increasingly serious violations of your basic obligations as a litigant. **We thus ask again that you immediately identify the platform that you have utilized and demand that you preserve all associated records.**

Best regards,

**K&L GATES**

Ryan Q. Keech  
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Arjun Vasan <arjun.vasan@gmail.com>

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## Notice of Breach Regarding Service Method – Merger Agreement § 9.11

Keech, Ryan Q. <Ryan.Keech@klgates.com>  
To: Arjun Vasan <arjun.vasan@gmail.com>  
Cc: "Warns, Tom A." <Tom.Warns@klgates.com>

Fri, May 30, 2025 at 4:06 PM

Mr. Vasan,

Service was effectuated months ago. The law does not recognize the validity of generative AI-fueled email denials of service as defenses to the claims pending against you.

Best regards,



Ryan Q. Keech  
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**From:** Arjun Vasan <arjun.vasan@gmail.com>  
**Sent:** Friday, May 30, 2025 12:24 PM  
**To:** Keech, Ryan Q. <Ryan.Keech@klgates.com>  
**Cc:** Warns, Tom A. <Tom.Warns@klgates.com>  
**Subject:** Re: Notice of Breach Regarding Service Method – Merger Agreement § 9.11

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[Quoted text hidden]

Mr. Vasan (or the “generative AI” program posing as Mr. Vasan),

We take it from this afternoon’s outburst that you consider it to be “unhinged” for our client to reject your apparent expectation that our client will pay you millions of dollars notwithstanding the evidence of your participation in and orchestration of the fraudulent conduct alleged in the complaint pending against you. Obviously, our client disagrees with your position. Further, and while we continue to be puzzled by what you think you are doing, we note your latest admission regarding your obvious and improper use of “generative AI” to facilitate your threats and harassment of Checkmate and its counsel and will continue to proceed accordingly.

Best regards,



**Ryan Q. Keech**  
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**From:** Arjun Vasan <[arjun.vasan@gmail.com](mailto:arjun.vasan@gmail.com)>  
**Sent:** Thursday, May 29, 2025 5:11 PM  
**To:** Keech, Ryan Q. <[Ryan.Keech@klgates.com](mailto:Ryan.Keech@klgates.com)>; Warns, Tom A. <[Tom.Warns@klgates.com](mailto:Tom.Warns@klgates.com)>  
**Subject:** Re: Notice of Breach Regarding Service Method – Merger Agreement § 9.11

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[Quoted text hidden]



Arjun Vasan <arjun.vasan@gmail.com>

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## Notice of Breach Regarding Service Method – Merger Agreement § 9.11

Keech, Ryan Q. <[Ryan.Keech@klgates.com](mailto:Ryan.Keech@klgates.com)>  
To: Arjun Vasan <[arjun.vasan@gmail.com](mailto:arjun.vasan@gmail.com)>, "Warns, Tom A." <[Tom.Warns@klgates.com](mailto:Tom.Warns@klgates.com)>

Wed, May 28, 2025 at 6:12 PM

Mr. Vasan,

Thank you for your response. Given that you have now reviewed the Merger Agreement and acknowledge that its provisions apply to the litigation of this dispute (which is an acknowledgment that we appreciate), we trust that you will be withdrawing your opposition to Checkmate's pending motion to dismiss and answering the complaint filed and pending against you in New York. We would be happy to prepare drafts of any required notices if you would prefer that we do so. Please let us know.

Best regards,



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**From:** Arjun Vasan <[arjun.vasan@gmail.com](mailto:arjun.vasan@gmail.com)>  
**Sent:** Wednesday, May 28, 2025 6:01 PM  
**To:** Warns, Tom A. <[Tom.Warns@klgates.com](mailto:Tom.Warns@klgates.com)>  
**Cc:** Keech, Ryan Q. <[Ryan.Keech@klgates.com](mailto:Ryan.Keech@klgates.com)>  
**Subject:** Re: Notice of Breach Regarding Service Method – Merger Agreement § 9.11



Arjun Vasan <arjun.vasan@gmail.com>

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## Notice of Breach Regarding Service Method – Merger Agreement § 9.11

Keech, Ryan Q. <Ryan.Keech@klgates.com>  
To: Arjun Vasan <arjun.vasan@gmail.com>, "Warns, Tom A." <Tom.Warns@klgates.com>

Wed, May 28, 2025 at 8:29 PM

Mr. Vasan,

Notwithstanding these outbursts and puzzling attempts to harass Checkmate and its counsel, it is clear, as it is with many things you send, that you understood what you meant by Merger Agreement when you used those terms. Your written demands to enforce what you correctly admit are the “bargained for” provisions of the Merger Agreement to bind yourself and the parties to this litigation require a prompt withdrawal of your opposition to Checkmate’s motion to dismiss and your answering of the complaint pending against you so as to fully and promptly enable the parties to address the evidence of the misconduct surrounding the VoiceBite transaction and your participation in it.

We look forward to your compliance with the foregoing.

[Quoted text hidden]



Arjun Vasan <arjun.vasan@gmail.com>

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**RE: Arjun Vasan v. Checkmate.com, Inc. - 2:25-cv-00765-memf-jpr (re meet and confer re checkmate's deficiencies and misconduct) [KLG-AMERICAS.FID3718879]**

Keech, Ryan Q. <Ryan.Keech@klgates.com>

Wed, Oct 1, 2025 at 12:35 PM

To: "Makitalo, Rebecca I." <Rebecca.Makitalo@klgates.com>, Arjun Vasan <arjun.vasan@gmail.com>

Cc: "Chiu, Stacey G." <Stacey.Chiu@klgates.com>, "Winningham, Jacob R." <Jacob.Winningham@klgates.com>

Mr. Vasan,

To add to my colleague's email below, notwithstanding your propensity for expressing yourself in a variety of inexplicably angry late-night AI-fueled missives, the Court has already rejected your attempt to interfere with third-party discovery. Checkmate has no obligation to and will not be discussing the obligations of recipients of third party subpoenas with you.

Moreover, because it appears that you may be attempting to manipulate and provide pseudo-legal "advice" to at least some third parties, we again remind you that you are not a lawyer, that there are very serious consequences associated with behaving as if you are one and that we look forward to obtaining relevant evidence from all recipients of third-party discovery in this case and otherwise regarding your communications with them. Checkmate reserves all rights in this regard and with respect to your other improper conduct in this case.

I know my colleagues look forward to your availability as noted below.

Best regards,

Ryan



**Ryan Q. Keech**

Partner

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Arjun Vasan <arjun.vasan@gmail.com>

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## Improper Subpoenas to Nessler and L. Varadarajan — Withdraw or Confer (FRCP 45/30; L.R. 37)

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Keech, Ryan Q. <Ryan.Keech@klgates.com>

Fri, Aug 15, 2025 at 11:33 AM

To: Arjun Vasan <arjun.vasan@gmail.com>, "Chiu, Stacey G." <Stacey.Chiu@klgates.com>, "Makitalo, Rebecca I." <Rebecca.Makitalo@klgates.com>

Mr. Vasan,

We're somewhat baffled with these communications. You have notice and, as best as we can tell, have not asserted any valid objections on your own behalf.

As for Mr. Varadarajan, you're not a lawyer. You're a pro se party. You're welcome to represent yourself, use generative AI to produce nonsense on your own behalf and expect that the fact you're doing same is not painfully obvious and/or running you headlong into a forthcoming sanctions order. But what you can't do, and are forbidden from doing, is representing anybody else. We will work with Mr. Varadarajan in good faith to accommodate his legitimate interests, but he is a fact witness and will need to provide discovery: we would think that you would welcome that possibility. If you interfere in any way or prepare documents for these individuals, we will seek and obtain additional sanctions against you for that conduct.

Ryan



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